

1 Hillary A. Brooks (*admitted pro hac vice*)
hillary@brooksquinn.com
2 Delfina S. Homen (*admitted pro hac vice*)
delfina@brooksquinn.com
3 BROOKS QUINN, LLC
6513 132nd Ave NE # 378
4 Kirkland, WA 98033
Telephone: (503) 629-1559

5 Ryan Tyz (CSB No. 234895)
6 ryan@tyzlaw.com
Sean K. Apple (CSB No. 305692)
7 sapple@tyzlaw.com
TYZ LAW GROUP PC
8 4 Embarcadero Center, 14th Floor
San Francisco, CA 94111
9 Telephone: (415) 849-3578

10 Attorneys for SCOTT GRIFFITH COLLABORATIVE SOLUTIONS, LLC d/b/a SG
11 Collaborative Solutions, LLC

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND DIVISION**

15
16 CARE AMBULANCE SERVICE, INC.,
17 FALCK USA, INC., FALCK NORTHERN
CALIFORNIA CORP., and FALCK
ROCKY MOUNTAIN, INC.,

18 Plaintiffs,
19
20 v.

21 SCOTT GRIFFITH COLLABORATIVE
22 SOLUTIONS, LLC d/b/a SG Collaborative
Solutions, LLC.,

23 Defendant.

Case No: 4:19-cv-08171-SBA

Related to: 4:19-cv-06104-SBA

**DECLARATION OF MICHAEL J.
COFFIN IN SUPPORT OF SG
COLLABORATIVE SOLUTIONS'
REVISED SPECIAL MOTION TO
STRIKE (ANTI-SLAPP MOTION)**

1 I, Michael J. Coffin, hereby declare as follows:

2 1. I am the COO of Defendant Scott Griffith Collaborative Solutions, LLC d/b/a SG
3 Collaborative Solutions, LLC (“SGCS”). I am personally knowledgeable regarding the subject
4 matter stated herein and make this declaration in support of SGCS’s *Revised* Special Motion to
5 Strike (Anti-SLAPP Motion).

6 2. I am one of three members of SGCS. I was a member/owner of SGCS prior to
7 and on September 26, 2019, when Plaintiffs filed this lawsuit.

8 3. I am currently a California resident, and have been a California resident at all
9 times relevant to this dispute. I live in Paso Robles, California, at a residential address, a fixed
10 residence, that I have lived at since 2003, and I have the intention to remain at that California
11 residence indefinitely. I hold a California driver’s license, am registered to vote in California,
12 and voted in the most recent statewide general election in November 2018.

13 4. SGCS discovered FNC’s infringement in the Alameda County RFP on September
14 4, 2019.

15 5. I drafted our cease-and-desist letter to FNC, a copy of which is attached to the
16 Amended Complaint as Exhibit C, while sitting in California. On behalf of SGCS, I emailed that
17 cease-and-desist letter from my work email address, michael@sgcdigital.com, from California,
18 where I live, on September 10, 2019. See the first page of the letter, which states it was
19 “Transmitted via email to: bill.sugiyama@falck.com,” which is a true and correct recitation of
20 the transmission method I used on September 10, 2019. The physical address on the letter is the
21 physical address we have registered with the Texas Secretary of State for SGCS and that we use
22 in all business-related documents, but it is not the physical address from which the letter was
23 transmitted. The letter was transmitted from my physical address in California.

24 6. On the afternoon of September 10, 2019, Troy Hagen, acting as CEO of FNC,
25 telephoned me in California responsive to the letter. My understanding is that Troy Hagen also
26 lives and works in California. During that telephone call and in a subsequent text exchange, Mr.
27 Hagen admitted that in addition to the Alameda County RFP, SGCS’s content was used in RFPs
28 for Los Angeles and Orange Counties.

1 7. The *Colorado Springs Independent* sought comment from SGCS concerning the
2 copy of our cease-and-desist letter that they had republished in an online article. See the article
3 attached as Exhibit D to the Amended Complaint. On behalf of SGCS, I made the media response
4 reproduced in that article from California, where I live.

5
6 I declare under penalty of perjury under the laws of the United States of America that the
7 foregoing is true and correct.

8
9 Dated: May 6, 2020


Michael J. Coffin

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28